

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
v. ) Criminal No. 12-92  
RICHARD BUSH )  
MAYANK MISHRA )  
WILLIS WHEELER )

**GOVERNMENT'S MOTION FOR LEAVE TO FILE  
MOTION *EX PARTE* AND UNDER SEAL**

AND NOW comes the United States of America, through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Brendan T. Conway, Assistant United States Attorney for said district, and respectfully submits its Motion for Leave to File Motion *Ex Parte* and Under Seal. At the same time as the filing of this motion, the government provided the Court with a copy of the government's motion that it wants to file *ex parte* and under seal. Based on the information set forth in that motion, there are adequate grounds for the government to file the motion *ex parte* and under seal, and there is no prejudice to the defendants. The government further requests that, due to the impracticability of redacting said document because the document is replete with sensitive information, the government shall not be required to file a redacted version of the document.

WHEREFORE, for the reasons set forth above, the Court permits the government to file its motion *ex parte* and under seal.

Respectfully submitted,

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